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UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

In Re Bard IVC Filters Products  
 Liability Litigation

No. MD-15-02641-PHX-DGC

**MOTION FOR LEAVE TO FILE UNDER  
 SEAL PLAINTIFFS' RESPONSE TO  
 BARD'S SUBMISSION RE SELECTION  
 OF CASES FOR DISCOVERY GROUP 1  
 and  
 MOTION TO SEAL FILED  
 DOCUMENTS**

Plaintiffs move this Court for an Order pursuant to the Stipulated Protective Order (Doc. 268), Federal Rule of Civil Procedure 26(c)(1)(G), and Local Civil Rule 5.6, sealing Plaintiffs' Response to Bard's Submission re Selection of Cases for Discovery Group 1. Plaintiffs' Response contains personal healthcare information that is protected under HIPAA and confidential under the Stipulated Protective Order, warranting protection from public disclosure.

Plaintiffs also move this Court to seal Plaintiffs' Submission re Proposed List of Additional Discovery Group 1 Cases (Doc. 4336), Defendants' Submission in Opposition to Plaintiffs' Proposed List of Additional Discovery Group 1 Cases (Doc. 4342), and Defendants' Submission re Discovery Group 1 (Doc. 4341) as these documents also

1 contain personal healthcare information regarding various plaintiffs that is protected under  
2 HIPAA and confidential under the Stipulated Protective Order.

3 Bard does not oppose this Motion.

4 For the foregoing reasons, this Court should grant Plaintiffs' leave to file their  
5 Response under seal and to seal Document numbers 4336, 4342, and 4341.

6 RESPECTFULLY SUBMITTED this 27th day of December 2016.

7 GALLAGHER & KENNEDY, P.A.

8 By: /s/ Paul L. Stoller

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22 **CERTIFICATE OF SERVICE**

23 I hereby certify that on this 27th day of December, 2016, I electronically  
24 transmitted the attached document to the Clerk's Office using the CM/ECF System for  
25 filing and transmittal of a Notice of Electronic Filing.

26 /s/ Deborah Yanazzo